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7 WAYNE RUDEN

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

**IN RE: BARD IVC FILTERS
PRODUCT LIABILITY LITIGATION,**

THIS DOCUMENT RELATES TO:

WAYNE RUDEN,
C. A. No.: CV-16-00344-PHX-DGC

WAYNE RUDEN

Plaintiff

VS

C R BARD INC et al

Defendants

MDL Docket No. 15-02641

**DECLARATION OF GLEN TURNER
IN SUPPORT OF PLAINTIFF WAYNE
RUDEN'S OPPOSITION TO
CALIFORNIA PACIFIC MEDICAL
CENTER'S MOTION TO DISMISS
PLAINTIFF'S AMENDED
COMPLAINT; OR IN THE
ALTERNATIVE TO REMAND**

Complaint Filed: October 7, 2015

ORAL ARGUMENT REQUESTED

I, Glen Turner, declare as follows:

2 1. I am an attorney licensed to practice law in California. I am an attorney
3 with the law firm of Ongaro PC, attorneys of record for plaintiff Wayne Ruden in the
4 above captioned matter. I am one of the attorneys prosecuting this matter for Mr. Ruden.
5 The facts set forth herein are of my own personal knowledge and if called upon to testify,
6 I could and would do so competently. I submit this declaration in support of Mr. Ruden's
7 Opposition to California Pacific Medical Center's Motion to Dismiss Plaintiff's First
8 Amended Complaint.

9 2. Attached as **Exhibit 1** is a true and correct copy of Mr. Ruden's First
10 Amended Complaint.

11 I declare under the penalty of perjury under the laws of the State of California that
12 the foregoing is true and correct, and that this declaration was executed on March 4,
13 2016, in San Francisco, California.

Glen TL

Glen Turner

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 4th day of March, 2016, a copy of the foregoing was
3 served electronically and notice of the service of this document will be sent to all parties
4 by operation of the Court's electronic filing system to CM/ECF participants registered to
5 receive service in this matter. Parties may access this filing through the Court's system.
6

7 _____
8 */s/Glen Turner*
9 Glen Turner
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